

1 BOIES, SCHILLER & FLEXNER
2 DOUGLASS A. MITCHELL, ESQ.
3 Nevada Bar No. 3775
4 300 South Fourth Street, Suite 800
Las Vegas, Nevada 89101
Telephone (702) 382-7300

5 Attorneys for Defendant
6 Charles McChesney

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 -Oo-

10 UNITED STATES OF AMERICA,)
11) CASE NO. 2:13-cr-00018-JCM-GWF
12 Plaintiff,)
13 v.)
14 CHARLES MCCHESNEY,) **STIPULATION TO EXTEND TIME For**
15 Defendant.) **FILING CHARLES McCHESNEY'S**
16) **SENTENCING MEMORANDUM**
17) **(FIRST REQUEST)**

18 IT IS HEREBY STIPULATED AND AGREED by and between CHARLES LA BELLA,
and DOUGLASS MITCHELL, ESQ., counsel for defendant Charles McChesney, that the
deadline for Mr. McChesney to file his Sentencing Memorandum setting forth his objections to
the Probation Office's Pre-Sentence Report ("PSR") be extended one day, from July 13, 2015
(current deadline) to July 14, 2015. This is the first request to extend the time for Mr.
McChesney to file his Sentencing Memorandum.

22 This Stipulation is entered into for the following reasons:

23 1. On January 27, 2015, Defendant Charles McChesney entered a plea of guilty to
24 the wire fraud and conspiracy to commit wire and mail fraud charges against him.
25 2. Defendant Mr. McChesney's sentencing is set for July 20, 2015.
26

3. Initially, Mr. McChensey's PSR was due to counsel for the Government and defense counsel on June 15, 2015.
4. On June 12, 2015 and again on June 22, 2015, the Government and Mr. McChesney stipulated to extend the time for the Department of Parole & Probation to disclose the PSR from June 15, 2015 to June 22, 2015 and from June 22, 2015 to June 25, 2015. The parties requested the extensions in order to give them an opportunity to consider the Court's decisions following the June 15, 2015 evidentiary hearing regarding the amount of loss in this matter and the June 17, 2015 sentencing hearings for defendants Keith Gregory, Salvatore Ruvolo, David Ball, and Edith Gillespie.
5. Mr. McChesney provided the Probation Office with his preliminary objections to the PSR on July 10, 2015.
6. The Probation Office provided Mr. McChesney with a revised PSR on July 13, 2015. Mr. McChesney needs at least one day to review the revised PSR before submitting his formal objections to the Court.

7. Accordingly, Mr. McChesney now asks the Court to extend the deadline for filing his Sentencing Memorandum from July 13, 2015 to July 14, 2015. The additional time will provide Mr. McChesney an opportunity to confer with his attorney and prepare objections that respond to the revised PSR disclosed on July 13, 2015.

DATED this 13th day of July, 2015.

Respectfully submitted,

/s/ Charles La Bella
CHARLES LA BELLA
Trial Attorney

/s/ Douglass Mitchell
DOUGLASS MITCHELL
Counsel for Defendant Charles McChesney

DATED July 14, 2015.

IT IS SO ORDERED.

James C. Mahan
HON. JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

I, the undersigned, hereby certify that this pleading was filed with the clerk of court via ECF and will be served electronically via ECF on all parties that have entered their appearances in this case.

Dated: June 12, 2015

Respectfully submitted,

/s/ Douglass A. Mitchell

Douglass A. Mitchell
Attorney for Charles McChesney